

EXHIBIT G

Hartnett, Kathleen

From: Jay Schuffenhauer <Jschuffenhauer@bsfllp.com>
Sent: Friday, November 8, 2024 12:31 PM
To: Ghajar, Bobby A.
Cc: Maxwell Pritt; Morton, Phillip; Llama C-Counsel; Brigham, Matthew; z/Meta-Kadrey; Dunning, Angela L.; mlemley@lex-lumina.com
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief
Attachments: Kadrey v. Meta - Stip and PO re Omnibus Discovery Letter .docx

[External]

Regarding #2, I should clarify, please let us know whether you agree to have us file the stipulation.

From: Jay Schuffenhauer <Jschuffenhauer@bsfllp.com>
Sent: Friday, November 8, 2024 3:29 PM
To: Ghajar, Bobby A. <bghajar@cooley.com>
Cc: Maxwell Pritt <mpritt@BSFLLP.com>; Morton, Phillip <pmorton@cooley.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Bobby,

1. We will respond separately regarding the Zuckerberg stipulation.
2. On today's joint filings, we are willing to sign the stipulation + PO with your edits to put that issue behind us. A clean copy of that stipulation is attached. Let us know if you agree to file.
3. Noted with respect to the privilege briefing.
4. We cannot agree to fully forego reply rights, but if you send us your sections by 6 PM PT, we can turn around our reply by 8:30 PM PT, and receive your final changes by 9:30 PM PT.

Let us know if (2) and (4) are acceptable.

Jay

From: Ghajar, Bobby A. <bghajar@cooley.com>
Sent: Friday, November 8, 2024 2:50 PM
To: Maxwell Pritt <mpritt@BSFLLP.com>; Morton, Phillip <pmorton@cooley.com>; Jay Schuffenhauer <Jschuffenhauer@bsfllp.com>
Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

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Hi Max,

Thank you for your email.

As to the proposed stipulation you sent to us regarding the omnibus discovery motion, we appreciate you reaching out for our cooperation. We would ask that, in the spirit of that cooperation, you reconsider your position and sign the MZ deposition scheduling stipulation to avoid unnecessary motion practice on that issue – without the various strings attached and consistent with the agreement we previously reached. With the expectation that we can put that simple agreed-upon deposition scheduling issue to rest, we have made a few clarifying edits to your draft stipulation, shown in the attached; to be clear, we are OK in this instance with a combined filing for administrative efficiency purposes. We look forward to working with you to finalize, and to receiving a PO reflecting our clarifying edits.

As to the privilege brief, which we still have not seen, we cannot agree to your proposal for reasons others on my team have mentioned and I do not repeat here.

As to Meta's brief, we look forward to receiving your portion at 3:30pm. On the "omnibus discovery brief" do you anticipate making reply edits to Meta's portion? If not, we can reach a mutual agreement to forego further substantive edits on Plaintiffs' omnibus discovery motion and Meta's motion to enforce Court deadlines and other relief. We do agree that today's filings should be completed at a reasonable time this evening.

Thank you,

Bobby Ghajar

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Friday, November 8, 2024 9:33 AM

To: Morton, Phillip <pmorton@cooley.com>; Jay Schuffenhauer <jschuffenhauer@bsfllp.com>

Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

[External]

Good morning, Phil.

We understand your position and remain committed to continuing to try to work through similar issues in the future if they arise. Early next week, if you and Meta are amenable to it, it may make sense for the parties to create a joint discovery letter briefing schedule/timeline that would apply to all future disputes. We have done this in other cases and it has been beneficial.

Regarding today's filings, our intention is to file a privilege brief no longer than 10 pages, with an administrative request for leave to do so. The administrative request will also seek a November 14 response date for Meta's brief. That is identical to what Meta previously proposed, so please let us know if you will agree to a stipulation so this can be done jointly.

As for the other joint briefing, we hope there is still agreement to file one omnibus brief rather than five separate ones. If that is the case, we are circulating the attached stipulation and proposed order for Meta's review. We also anticipate that there may be a need for sealing some portions of that brief and exhibit(s). Please confirm whether Meta will be preparing a joint motion to seal. We are amenable to whatever process Meta prefers for that.

Finally, we are in receipt of your 2.5-page brief involving Plaintiffs' other discovery requests and third-party subpoenas served yesterday at 3:26pm PT. We will send our response by 3:30 PM PT as agreed. Is Meta anticipating making reply edits? If so, please let us know if the parties can agree for those to be exchanged by 7 PM PT, with Plaintiffs' final edits due by 9 PM PT?

Thank you.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Thursday, November 7, 2024 9:26 PM

To: Jay Schuffenhauer <jschuffenhauer@bsfllp.com>

Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

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Jay-

Thank you for your email. We have tried to work out these briefing issues over the course of this week, including after Max stated in his email this morning that the parties are at an impasse. However, Plaintiffs continue to expand the scope of the issues they seek to present and seek accommodations we cannot agree to. There simply isn't time for the parties to continue negotiating over briefing lengths and schedules when they are due tomorrow, and thus the parties must adhere to Judge Hixson's standard procedures.

Ever since Judge Chhabria's order allowing you to file briefing tomorrow on Existing Discovery Issues, we have repeatedly requested that you explain what issues you are moving on. You did not fully identify what non-privilege Existing Written Discovery issues you would be raising until the letter brief portions you sent yesterday. And regarding privilege-related issues, your disputes were not timely raised by the October 16 deadline for meeting and conferring regarding Existing Written Discovery issues. Rather, you only raised your privilege disputes on October 23, 7 days after the Meet and Confer deadline for Existing Written Discovery issues. And it was not until Max's email of this evening that Plaintiffs identified numerous issues and hundreds of privilege log entries that you apparently plan to unilaterally brief in an extended length briefing tomorrow.

Not only was the scope of relief you were seeking not fully known until the last 24 hours, but our negotiations over the briefing became tied to Plaintiffs' ever escalating conditions, including regarding Mr. Zuckerberg's deposition stipulation (e.g., demanding Meta provide search terms for Mr. Zuckerberg, then identify various scopes of data sources, and finally a demand that Meta waive certain objections to future motions on documents or

testimony). There is no basis for these demands; all that is required is a simple stipulation about a deposition date for Mr. Zuckerberg that Plaintiffs already agreed to and represented to the Court they would submit.

We appreciate that the parties tried to work this out over the course of this week and hope that the parties can continue such efforts in the future, but given tomorrow's deadline we must move forward in reliance on Judge Hixson's standard procedures.

Thanks,
Phil

From: Jay Schuffenhauer <jschuffenhauer@bsfillp.com>

Sent: Thursday, November 7, 2024 9:45 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Llama C-Counsel <llama_cocounsel@bsfillp.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

[External]

Thank you for your email, Phil.

We look forward to receiving your responses to the non-privilege issues tomorrow.

Regarding the privilege briefing, your email incorrectly states that the parties did not meet and confer on these issues—Plaintiffs spelled out in detail the issues in dispute in our October 23 meet-and-confer letter and intend to move on issues that were not resolved by Meta in its November 1 reply letter. We also identified these issues in our email today, per Meta's request. Given the plethora of live privilege issues, Plaintiffs cannot address them in 2.5 pages. If Meta will not agree to a reasonable joint briefing schedule and page limits as we proposed, we will have no choice but to file our own letter brief tomorrow night with an administrative motion to extend page limits. The proposal set forth this morning in Max Pritt's email is similar to the proposal Meta provided on Tuesday night, so the parties should be able to agree. It feels to us like the best resolution of this issue.

Regarding the Zuckerberg stipulation, it's unclear what "more conditions" you're referring to in your email. If it refers to our request that Meta identify all data sources Mr. Zuckerberg uses in addition to the ones Meta searched in the MZ production, we are willing to forego that request if it facilitates global resolution of these issues. We reserve all rights to challenge the adequacy of Meta's search and production of MZ documents. As we've stated before, Meta has not provided us the ability to assess whether it has abided by the terms of the parties' confidential agreement. Accordingly, this is our last offer. If we can't reach agreement now, then Plaintiffs will proceed to notice and take Mr. Zuckerberg's deposition within the discovery period as ordered by the Court.

Please respond tonight.

Best,
Jay

From: Morton, Phillip <pmorton@cooley.com>

Sent: Thursday, November 7, 2024 8:16 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Jay Schuffenhauer <jschuffenhauer@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com
Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>
Subject: Re: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

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Hi Max-

Thanks for your patience. We have a number of people in court and traveling today. After discussion with our client, we are declining the proposal below. We made what we believed was a reasonable proposal, but Plaintiffs have added yet more conditions on issues on which there should be no dispute (e.g., filing a stipulation that Plaintiffs agreed to file regarding a negotiated and agreed-upon deposition date).

We will respond to the letter brief you served yesterday by 6pm PT tomorrow so that it may be timely filed with the Court. To the extent you intend to move on any privilege log issues, those were not the subject of a meet and confer by October 16 and would not be timely even under the Court's order extending the letter briefing deadline for Existing Written Discovery to November 8. We have not timely received your section of the letter brief and must receive your 2.5 page letter brief immediately. Reserving all rights, we will respond to that letter brief in time for you to file tomorrow. With respect to the stipulation regarding Mr. Zuckerberg, we will ask Judge Chhabria to order the deposition occur on December 17 consistent with the parties' agreement and prior representations to the Court.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Thursday, November 7, 2024 6:32 PM
To: Morton, Phillip <pmorton@cooley.com>; Jay Schuffenhauer <jschuffenhauer@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>
Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>
Subject: Re: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

[External]

Thank you, Phil. Please call (415-722-6382) if it's more helpful to discuss anything further by phone re the scheduling after you hear back.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Thursday, November 7, 2024 3:28 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Jay Schuffenhauer <jschuffenhauer@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>

Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

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Max-

Here is our portion of the letter brief on Plaintiffs' untimely discovery requests and subpoenas. Please provide your response by 330pm PT tomorrow. We will file it tomorrow night.

On the schedules, we are still discussing with the client. I expect we will be back in touch soon.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Thursday, November 7, 2024 5:32 PM

To: Morton, Phillip <pmorton@cooley.com>; Jay Schuffenhauer <jschuffenhauer@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com

Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

[External]

Hi Phil, just checking in on this to see if the parties can reach an agreement re: schedules. Thank you.

Best,

Max

From: Maxwell Pritt

Sent: Thursday, November 7, 2024 11:47 AM

To: Morton, Phillip <pmorton@cooley.com>; Jay Schuffenhauer <jschuffenhauer@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com

Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Hi Phil,

Nice to speak with you. Here's what I ran through on the call as a potential compromise on the various issues. If this works, great, but if there's any issues and it's easier to call, I'm around. Thank you!

Best,

Max

Non-Priv Discovery Briefing

1. Meta will provide its sections and any declarations/exhibits by 5pm PT Friday, including identifying anything it will seek to seal in Plaintiffs' and Meta's papers, which Plaintiffs will not oppose.
2. Plaintiffs' final edits (and no new exhibits or new arguments, just responses) will be due by 9pm PT Friday.
3. Meta's final edits (and no new exhibits or new arguments, just replies to responses) will be due by 10:30 pm PT, with any motion to seal papers.

4. Plaintiffs to file by midnight Friday.

Priv Briefing

4. Plaintiffs will identify issues it will brief, including log entries, by COB today (11/7).
5. Meta will identify any issues that may be resolved informally by noon Friday (11/8).
6. Plaintiffs will file their priv motion EOD Friday (11/18).
7. Meta will its response COB Thursday (11/14).
8. Plaintiffs will request from Judge Hixson to file a reply EOD Saturday (11/16), which Meta will not oppose.
9. The parties will stipulate to submit no more than 15 pages each for the motion and response, and 8 pages for the reply (if a reply is permitted by Judge Hixson).
10. Declarations and exhibits may accompany the motion and response (and will not contain legal argument).

Meta PO

1. Meta will provide section of brief by noon PT today or a time shortly thereafter identify by Meta (11/7).
2. Plaintiffs will provide response by noon PT tomorrow (11/18) or 24 hours after receipt of Meta's portion.
3. Meta's final edits (and no new exhibits or issues/arguments just replies to response) due 5pm (or 5 hours after receipt of Plaintiffs' portion).
4. Plaintiffs' final edits (and no new exhibits or issues/arguments, just responses to reply, if any) will be due by 7pm (or two hours after receipt of Meta's reply).
5. Meta to file by EOD Friday.

MZ Stipulation

1. Meta to provide further revisions to draft stipulation, if any.
2. Plaintiffs to confirm agreement or make any further revisions.
3. Meta to file stipulation and simultaneously provide (1) all search terms and hit counts used for MZ productions, and (2) all data sources used by MZ, see JS 11/6 11:03pm Email.
4. Meta agrees Plaintiffs have not waived ability to M&C re and/or challenge MZ production, including sufficiency of search terms used and data sources searched, or testimony.

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Thursday, November 7, 2024 10:49 AM
To: Morton, Phillip <pmorton@cooley.com>; Jay Schuffenhauer <jschuffenhauer@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com
Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>
Subject: Re: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Phil, I'm available at 415-722-6382 if you would like to call to see if we can work these things out.

Best,

Max

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Thursday, November 7, 2024 10:24:32 AM
To: Morton, Phillip <pmorton@cooley.com>; Jay Schuffenhauer <jschuffenhauer@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>
Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>
Subject: Re: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Counsel, Plaintiffs disagree with the mischaracterizations in your email. But to cut to the chase, Plaintiffs cannot agree to waive our ability to reply on either brief. So if Meta will not agree to schedules that include our ability to do (and your ability to sue-reply if requested as the parties have done previously), then we are at an impasse.

Best,

Max

From: Morton, Phillip <pmorton@cooley.com>
Sent: Thursday, November 7, 2024 10:16 AM
To: Jay Schuffenhauer <jschuffenhauer@bsfllp.com>; Brigham, Matthew <mbrigham@cooley.com>; z/Meta-

Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>

Cc: Maxwell Pritt <mpritt@BSFLLP.com>; Llama C-Counsel <llama_cocounsel@bsflp.com>

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

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Jay-

Thank you for sending the brief late yesterday afternoon and at 8:42pm, a 4MB zip file of exhibits. Setting aside the size of the exhibits, which we have not yet had an opportunity to fully review, Plaintiffs' brief spans "five" issues (with other subparts) and 15-pages. We still do not believe it is appropriate to submit such a lengthy brief (or 5 separate briefs), or to expect a response to it from Meta in a shortened time period when Plaintiffs have had weeks to brief these issues. We will note as such in our response and any filing necessitated if the parties are unable to reach an acceptable stipulation. Moreover, we object to your inclusion of the lengthy declaration of Dr. Krein (received late last night), which contains extensive and inappropriate argument that appears to be intended to circumvent any page limits.

Despite this prejudice and our objections, we remain willing to work with Plaintiffs on an appropriate schedule to resolve these issues, and to avoid *ex parte* practice regarding Plaintiffs' delayed briefing. In the interests of compromise, and without waiver, Meta is prepared to make the following schedule:

As to the discovery brief that you provided us this afternoon:

1. Plaintiffs cannot expand or add new issues or topics to the brief.
2. Meta can provide its sections and any declarations/exhibits by 5pm PT on Friday.
3. No further changes from Plaintiffs, who will file that evening.

On the privilege briefing, Meta remains of the view that Plaintiffs' motion is, at this point, untimely. There is no way that, absent Meta's agreement and stipulation, that Plaintiffs can abide by the Court's deadline or expect Meta to defend against a 10+ page privilege brief in less than two days. Nonetheless, we are prepared to consider the following compromise, provided we have agreement on all terms and put to rest the MZ stipulation this week.

4. Plaintiffs will confirm what privilege log entries it will challenge by COB tomorrow (11/7)
5. Plaintiffs will file their motion as to the privilege log issues by Friday (11/8) at 6pm.
6. Meta will file its response to that motion by COB Thursday (11/14).

7. The parties will stipulate to submit no more than 10 pages each (20 pages total) for the motion and response.
8. Declarations and exhibits may accompany the motion and response (but not contain additional legal argument)
9. We cannot agree to a reply and based on our experience in this case, do not believe Judge Hixson will permit one. If Plaintiff wishes to file a reply, it will need to seek leave to do so, and that reply – if permitted – may not exceed 5 pages.

On Meta's motion to enforce the October 18 written discovery deadline, we will send you our section by noon PST tomorrow and Plaintiffs will send back their response by noon PST on Friday for filing on Friday.

On the MZ stipulation, thank you for providing a revision. We will likely have a couple of edits, which we will send to you. If we have agreement on the above, and upon receipt of your approval, we will insert your signature and file it.

Please confirm that we are in agreement on these schedules.

Thanks,
Phil

From: Jay Schuffenhauer <jschuffenhauer@bsfllp.com>

Sent: Wednesday, November 6, 2024 11:38 PM

To: Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com

Cc: Maxwell Pritt <mpritt@BSFLLP.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

[External]

Counsel,

With apologies for the multitude of emails, attached please find a Zip file containing Plaintiffs' exhibits accompanying the discovery letter briefing.

Jay

From: Jay Schuffenhauer
Sent: Wednesday, November 6, 2024 11:03 PM
To: Brigham, Matthew <mbrigham@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com
Cc: Maxwell Pritt <mpritt@BSFLLP.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Counsel,

Following up on the below discussion involving Mr. Zuckerberg's scheduling stipulation, thank you for your agreement to provide the search terms Meta used in connection with the Zuckerberg production. Please also confirm, as requested in our email from November 3, that Meta will identify all devices; messaging systems, platforms, and/or apps; and document/data storage systems, platforms, and/or services used by Mr. Zuckerberg. Without this information, Plaintiffs cannot assess the adequacy of the Zuckerberg production and Meta's compliance with the parties' agreement and general discovery obligations.

Once you provide that information, and we have agreement regarding the schedule for Friday's other briefing, we are willing to file the attached stipulation regarding the date of Mr. Zuckerberg's deposition. This stipulation relates to the deposition date only. Plaintiffs reserve all rights to challenge any deficiency in the Zuckerberg production and/or his testimony.

Jay

From: Jay Schuffenhauer <jschuffenhauer@bsfllp.com>
Sent: Wednesday, November 6, 2024 7:34 PM
To: Brigham, Matthew <mbrigham@cooley.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>
Cc: Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Matthew,

Following up on the below, to narrow the scope of disputes about the briefing schedule, Plaintiffs can agree to respond to Meta's protective order brief by noon PT on Friday so it can be filed later that day.

Jay

From: Jay Schuffenhauer

Sent: Wednesday, November 6, 2024 6:45 PM

To: Bringham, Matthew <mbringham@cooley.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>

Cc: Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Matthew,

Plaintiffs did not receive a response for several hours from Meta to our alternate briefing proposal to Meta's counterproposals. At this point, it appears there is nothing to be gained from continuing to try to negotiate a schedule. The Court has provided a deadline of Friday by which the parties must brief these issues, and we intend to submit our briefs to the Court as ordered. Meta can choose to comply or not. Plaintiffs attach here a single brief that combines the issues we intend to move on Friday. Regarding exhibits, Plaintiffs are submitting a declaration from Dr. Jonathan Krein, which we will share with Meta as soon as possible. Plaintiffs' other exhibits will be a meet-and-confer email regarding Meta's searched data sources, and copies of selected written discovery requests + responses. We will share these as soon as possible.

Plaintiffs intend to follow the schedule proposed in our prior emails and hope Meta will agree to provide its positions. Plaintiffs nonetheless continue to be willing to negotiate in good faith so that the parties are briefing these issues orderly.

- Meta will provide its sections and any declarations/exhibits by 12pm PT on Friday.
- Plaintiffs' final edits (and no new exhibits) will be due by 5pm PT.
- Meta's final edits (and no new exhibits) will be due by 7 pm PT.

Plaintiffs understood that Meta preferred a single brief. If Meta no longer agrees to a single brief, then Plaintiffs will file five briefs in accordance with Judge Hixson's standing order. If Meta provides nothing by noon PT Friday, Plaintiffs will be forced to file our briefs and indicate that Meta chose not to provide their positions.

On the privilege briefing, Plaintiffs are not willing to forgo a reply but we can agree to shorten our time to reply and agree to the time you request for your opposition:

- Plaintiffs will file their motion as to the privilege log issues by EOD Friday.
- Meta will file its response to that motion by COB Thursday (11/13).
- Plaintiffs will file their reply by the EOD Friday (11/15).
- The parties will stipulate no more than 20 pages for the motion and response, and 10 pages for the reply.

Plaintiffs previously identified the issues we believe are deficient with respect to Meta's amended logs and privilege claims in our extensive meet and confer letter, but given your request below we also will identify the issues we believe remain at an impasse and thus would be briefed by noon tomorrow. Of course, we remain willing to meet and confer if Meta believes any of those remaining issues can be resolved informally.

As for the other issues you now raise below (a PO and Zuckerberg), we will respond after we have had sufficient time review and consider them.

Best,

Jay

From: Brigham, Matthew <mbrigham@cooley.com>

Sent: Wednesday, November 6, 2024 5:04 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>

Cc: Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>

Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Counsel,

Thank you for your email. As Bobby was traveling earlier today and preparing for a preliminary injunction hearing, I am responding to your email from earlier today.

Every moment that passes without Plaintiffs specifying all of the discovery issues on which they will move to compel on Friday, and without providing their briefing and exhibits, makes it more unfeasible for Meta to have a reasonable chance to respond and Plaintiffs to comply with the Court's new deadline. As is, you are leaving us with less than two days, which is not reasonable or sufficient on three issues let alone five or considering the separate privilege motion. Multiple members of our team are traveling, in depositions, or in hearings over the next few days, making it even more unreasonable for our side to respond to Plaintiffs on such short notice. As the Court's Order implicitly recognized, this delay was avoidable and a problem of Plaintiffs' making, not ours.

Your email from yesterday evening did not identify the issues that are the subject of Plaintiffs' planned motion. You alluded then and this morning to matters that were part of prior letters but that isn't notice, particularly given that we addressed or responded to those letters and we are unclear what issues remain in dispute. We should not be put in the position of guessing. Your email earlier today provides more context although it is still not clear what you mean with reference to "identifying and searching data sources," because pointing to 5 pages of your earlier letter doesn't tell us the relief Plaintiffs are seeking.

As to the two new issues just disclosed *this morning*, we cannot agree to brief those in two days. And we still haven't received *any* briefs or exhibits from Plaintiffs. You newly describe those issues as "failure to make available and/or produce all Llama source code/pull requests/commits and failure to produce or catalogue all copies of copyrighted works downloaded" - what RFPs cover these? What does failure to produce or catalogue copies of copyright works mean? And you note "Meta's R&Os on RFPs 64&77, 45, 46&53, and 54&59, ROG 17, and date range." Since receiving your email we have checked prior correspondence on this specific discovery requests, but again, it is unclear what you are seeking. What does "date range" refer to?

Although these remain open issues, and reserving all rights, we are willing to consider a stipulated schedule along the following lines. Without an agreement on all terms we do not have an agreement on any:

Plaintiffs to answer the above questions and outline in detail to Meta all specific discovery issues on which they will move to compel, including the relief requested. There can be no ambiguity. This should happen immediately and no later than 4pm PST.

1. Plaintiffs' final brief on all non-privilege log related discovery disputes, and all exhibits, to be provided to Meta by no later than 8pm today.
2. Provided that those issues are limited to the issues in your email from yesterday afternoon (not the two broad topics in your email this morning) and provided that we are in agreement regarding the scope of ESI related issues (ie if those issues are more expansive the schedule does not work for us), Meta would agree to provide you with its responsive brief and exhibits Friday at 7pm for a joint filing that evening.
3. Meta would stipulate not only to the following schedule but to allow attachments and expanded page limits.

4. Page limits for the above brief limited to 7.5 pages per side exclusive of exhibits and declarations.

As to Plaintiffs' motion as to privilege issues: we would agree that motion may be filed separately under these terms:

5. Plaintiffs must identify the issues, entries, and documents at issue in their anticipated motion by relief requested by today at 5pm PST.
6. Plaintiffs would serve their final motion, declaration and exhibits on Meta by Friday at 5pm PST.
7. Brief page limits for the privilege dispute would be expanded to 10 pages per side, not including declarations and exhibits.
8. Meta would file its response to that brief and all exhibits to Plaintiffs on Thursday by 5pm. We cannot agree to Wednesday particularly given that we do not have your response to our lengthy reply from November 1. No reply would be permitted which was the case with the parties' prior briefing on the Discord privilege issue.

Moreover, as part of a stipulation allowing the foregoing modifications and accommodating Plaintiffs' compressed motions, we want to determine and resolve other briefing / scheduling issues with you as well.

Further to Ms. Hartnett's Monday email and Mr. Pritt's response, we intend to file a motion to enforce the October 18 written discovery deadline and ask the Court to force Plaintiffs to withdraw the late written discovery, including all of the document subpoenas served after that date. Although this issue is not subject to Friday's deadline, relief is needed given the approaching response deadlines noted in those document subpoenas. We are prepared to provide you with Meta's brief tomorrow by noon PST and provided we receive your section on Friday morning at 9am PST, we are prepared to file it Friday. We do not propose enlargement of page limits for this brief, meaning that each side would have 2.5 pages.

We want to resolve the scheduling stipulation regarding Mr. Zuckerberg's deposition. Although we have no obligation under the parties' agreement to provide search terms and hit counts relating to his documents we will agree to do so. Please provide any edits to the stipulation we sent last week by COB and we will review and file and agree to provide the requested search terms and hit counts for his email, workchat, and WhatsApp simultaneous with your confirmation that we may insert your signature and file that stipulation. It is not appropriate to condition your compliance with the agreement on speculative discovery concerns or further demands.

Please let us know if we have an agreement.

In the meantime we reserve all rights and waive none.

-Matt

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Wednesday, November 6, 2024 8:43 AM
To: Ghajar, Bobby A. <bghajar@cooley.com>
Cc: Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

[External]

Fixed numerical issue highlighted yellow below.

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Wednesday, November 6, 2024 8:29 AM
To: Ghajar, Bobby A. <bghajar@cooley.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>
Cc: Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Bobby, please let us know on the alternate proposal.

To moot #1, in addition to the three issues we identified yesterday, we also intend to brief (1) failure to make available and/or produce all Llama source code/pull requests/commits and failure to produce or catalogue all copies of copyrighted works downloaded; and (2) Meta's R&Os on RFPs 64&77, 45, 46&53, and 54&59, ROG 17, and date range. As with the other issues, these were raised in our deficiency letters and the parties met and conferred orally and in writing on them. As for the issue of identifying and searching data sources, that's the same issues raised in the 10/31 letter brief (see, e.g., pp. 32-37).

We hope that Meta will agree that the parties do not need to brief by Friday any "existing written discovery" issues for which the parties are not at an impasse, such as issues one party has said they will supplement or otherwise consider. This would include things such as Meta's prior agreement to look into hyperlinked documents or imaging issues if/when identified by Plaintiffs, the parties dispute concerning Mr. Zuckerberg, and any issues that may arise concerning the custodians added by Judge Hixson on October 4. This list is not exhaustive, but again reflects issues for which there is not yet a dispute and/or impasse.

Best,

Max

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Wednesday, November 6, 2024 6:12 AM
To: Ghajar, Bobby A. <bghajar@cooley.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>
Cc: Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Good morning, Bobby.

As to pending issues, we've identified issues in dispute for a month, including in the admin motion.

As to the clarification you seek, despite Meta's recent position, the deadline for "existing written discovery" is—and always was—regarding party discovery and specifically the parties' R&Os to written discovery. We recognize you will continue to take the position you've recently asserted. But even so, the deadline doesn't apply to discovery served in October for which the parties haven't responded.

Re page limits for discovery briefing, we intend to raise five issues. At 2.5 pages each, that's 12.5 pages.

Best,

Max

From: Ghajar, Bobby A. <bghajar@cooley.com>
Sent: Tuesday, November 5, 2024 10:20 PM
To: Maxwell Pritt <mpritt@BSFLLP.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>
Cc: Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

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Max,

As it's late, we need to seek client feedback on your counter-proposal and I will not be able to get that until the morning. In the meantime, could you clarify a few things?

Your earlier email indicated that Plaintiffs were prepared to immediately exchange "three" discovery briefs on the issues identified in your 5:48pm email. We then asked for more specificity on one of those issues ("Meta's identification and search of data sources"). Although we await that response, your most recent email now mentions "remaining two issues" – what are those and have you identified them already? How do Plaintiffs reasonably believe that they can meet the Court's deadline if they are not prepared to fully identify for Meta all of the issues on which it plans to move? We cannot reach any agreement until we understand all of the issues on which Plaintiffs apparently intends to move.

Separately, we seek clarification of another comment in your email below. It says "all issues concerning "existing written discovery" (as of the Kadrey plaintiffs' and Meta's stipulation and proposed order setting that deadline)"; would you clarify what you mean by that? Is that meant to exempt any disputes as any discovery served after the date of that stipulation? Anything else?

Finally, we can have a further discussion about page limits, but if Plaintiffs intended to file "three joint letter briefs" (per your 5:48pm email), and assuming that was mutually acceptable to split the briefing into three, the page limits for those briefs would total 15 pages under Judge Hixson's rules, i.e. 7.5 per side. What is Plaintiffs' thinking behind 12.5 pages? Is that the length of the brief you are prepared to share with us tomorrow?

Reserving all rights and our commentary on the remaining terms of the proposal, we look forward to your clarification of the above issues.

As a head's up, I will be unavailable in the morning due to travel.

Good night,

Bobby

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Tuesday, November 5, 2024 8:53 PM
To: Ghajar, Bobby A. <bghajar@cooley.com>
Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>; Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

[External]

Bobby, we identified the three issues we would be prepared to send over drafts on tonight, not all issues.

And no, we do not agree to either of Meta's proposals. But here is a counter to your Alternative Proposal 2. Please let us know if you will agree so we can get a stip & PO on page limits on file tomorrow.

Thanks,
Max

Alternative 2 – Joint filing on non-privilege log issues on Friday, with Plaintiffs filing their motion as to the privilege log and claims on Friday, Meta's response due Wednesday, and Plaintiffs' reply due Friday.

1. Plaintiffs will confirm by tomorrow (November 6) at 9am PT all issues concerning "existing written discovery" (as of the *Kadrey* plaintiffs' and Meta's stipulation and proposed order setting that deadline) on which they intend to move.

2. Plaintiffs will also send briefing on the three issues identified in their email earlier today by 9am PT tomorrow (November 6) and the remaining two issues by 3pm PT tomorrow (November 6), including any declaration/supporting exhibits for all issues by 3pm PT or as soon as possible thereafter. Meta will provide its sections and any declaration/exhibits by 12pm PT on Friday (November 8). Plaintiffs' final edits (and no new exhibits) would be due by 5pm PT pm. Meta's final edits (and no new exhibits) would be due by 7 pm PT. The parties will stipulate to suspend page limits or, alternatively, that each side has 12.5 pages to cover all issues.
3. Plaintiffs would file their motion as to the privilege log issues on Friday by 5pm. Meta would file its response to that motion by end of day Wednesday (11/13), and Plaintiffs will file their reply by the end of the day Friday (11/15). The parties will stipulate to suspend page limits or, alternatively, no more than 20 pages for the motion and response, and 10 pages for the reply.

From: Ghajar, Bobby A. <bghajar@cooley.com>

Sent: Tuesday, November 5, 2024 8:02 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>

Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>; Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com

Subject: Re: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Hi Max,

On the first issue, all we sought was what you seemed to prepare via a brief tonight - the range of specific issues on which Plaintiffs intend to move this week.

On the second, let us know what you think of the rest of the proposal. I cannot tell from your email whether you take issue with other aspects of the schedule. Provided we have agreement on other issues, we have offered to stipulate to a longer single discovery brief to accommodate the issues.

We reserve all rights and objections in the meantime.

Regards,

Bobby

On Nov 5, 2024, at 7:26 PM, Maxwell Pritt <mpritt@bsfllp.com> wrote:

[External]

Bobby, we do not agree to your unreasonable request to identify all issues Plaintiffs might seek to brief, let alone within an hour, Bobby. You have had our deficiency letter since October 9 and our privilege deficiency letter since October 23. Further we do not agree to your proposal to brief all outstanding issues in a single motion, nor is that required by Judge Hixon's standing order, which contemplates issues briefed separately, each subject to his five-page limit unless otherwise agreed.

Plaintiffs made a reasonable proposal in good faith to brief certain issue now rather than wait to file briefs on all on Friday. If Meta needs additional time to provide responses to our portions of briefs on issues than this Friday, we are happy to provide it so long as Meta stipulates and does not raise timeliness issues as a result of such a stipulated schedule.

Best,

Max

From: Ghajar, Bobby A. <bghajar@cooley.com>
Sent: Tuesday, November 5, 2024 7:07 PM
To: Maxwell Pritt <mpritt@BSFLLP.com>; Llama C-Counsel <llama_cocounsel@bsfllp.com>
Cc: Dunning, Angela L. <adunning@cgsh.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>
Subject: RE: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

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Counsel,

We appreciate your alerting us to the issues you intend to brief for Judge Hixson on existing discovery disputes. As reflected by your October 28 proposed stipulation to exceed page limits, leave of Court is required for a discovery joint statement exceeding 5 pages. Moreover, four separate joint statements are not necessary, appropriate, or contemplated by Judge Chhabria's order or Magistrate Judge Hixson's rules governing discovery disputes. Except where invited or permitted by the Court, we have briefed issues in a single motion, not separate ones.

However, we are open to considering reasonable modifications to the presumptive limits and submitting a stipulation to Judge Hixson on these issues if we can reach agreement. We cannot have a repeat of last week's chaotic omnibus discovery brief. Nor is it fair or appropriate for Meta to have less than a day to respond to discovery briefing that Plaintiffs have had weeks to prepare. We will not agree to any schedule prejudicing Meta that is a consequence of Plaintiffs missing a Court's deadline in the first instance.

In the hope that the parties can work together in good faith on this submission in a manner that is fair to both sides, we propose a stipulation on the following terms:

Alternative 1 – Plaintiffs file a discovery motion on identified issues on Friday with Meta's response due Wednesday

1. Plaintiffs will confirm by tonight at 8pm that they have identified below **all** issues on which they intend to move, including exactly what Plaintiffs seek with respect to "Meta's identification and search of data sources";
2. Each side will have a total of 10 pages for all issues, including the privilege issues, to be divided up as they see fit;
3. Each side will also be permitted to submit supporting declarations and exhibits; and
4. The parties agree, subject to Judge Hixson's approval, to modify the standard process and allow Plaintiffs to file their discovery motion unilaterally on Friday at 5pm (11/8), with Meta's response due end of day Wednesday (11/13). That would complete the briefing.

Alternative 2 – Joint filing on non-privilege log issues on Friday, with Plaintiffs filing their motion as to the privilege log on Friday with Meta's response due Wednesday

1. Plaintiffs will confirm by tonight at 8pm that they have identified below **all** issues on which they intend to move, including exactly what Plaintiffs seek with respect to "Meta's identification and search of data sources";

2. Plaintiffs will send briefing on those discovery issues to Meta and any declaration/supporting exhibits by 9am PT tomorrow (November 6)—a date by which you have confirmed below you can be ready. Meta will provide its sections and any declaration/exhibits by 12pm PT on Friday (November 8). Plaintiffs' final edits (and no new exhibits) would be due by 3:30 pm. Meta's final edits (and no new exhibits) would be due by 5:30 pm. Under this alternative joint filing, we would stipulate that each side has seven and a half (7 1/2) pages to cover all issues (for a joint submission of 15 total pages or fewer).
3. Plaintiffs would file their motion as to the privilege log issues on Friday by 5pm. Meta would file its response to that motion by end of day Wednesday (11/13) or Thursday (11/14) of the following week, with no further briefing for either party thereafter. The parties would have up to eight (8) pages for each of their briefs addressing the privilege log issues.

The second alternative provides Meta only roughly two days to respond on the non-privilege discovery issues—as compared with the much longer time Plaintiffs have had to prepare their motion—but if the rest of the terms are acceptable and those issues are discrete, we are prepared to work with you to meet this schedule even though many of us are traveling or in depositions. Otherwise, we will not agree to such a truncated schedule. And Meta cannot and will not agree to complete briefing and declarations on important privilege issues, which require client input and review, in just 2-3 days. In this regard, we note that we have not received your response to our November 1 letter, so we do not know what issues remain in dispute.

Please let us know as soon as possible whether Plaintiffs will agree to one of the foregoing proposals. We can then work together to prepare a stipulation for submission to Judge Hixson tonight or early tomorrow. We reserve all rights to seek relief from Judge Chhabria or Judge Hixson if Plaintiffs will not work with Meta to make sure it has a fair and adequate opportunity to respond to the issues Plaintiffs intend to raise.

I will be stepping away from the office shortly, so please be sure to copy the team.

Regards,

Bobby Ghajar

From: Morton, Phillip <pmorton@cooley.com>

Sent: Tuesday, November 5, 2024 4:56 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com

Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>

Subject: Re: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

Max-

While we cannot agree to this schedule, we are considering it and will make a counterproposal.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Tuesday, November 5, 2024 5:48 PM

To: z/Meta-Kadrey <zmetakadrey@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>

Cc: Llama C-Counsel <llama_cocounsel@bsfllp.com>

Subject: Kadrey v. Meta - Proposed Exchange re Letter Briefs & Request re Privilege Letter Brief

[External]

Counsel,

Plaintiffs seek to file three joint letter briefs tomorrow, Nov. 6, on: (1) Meta's identification and search of data sources; (2) Meta's objections re: Plaintiffs' discovery into Llama 4 (and 5); and (3) Meta's response to ROG 15 and Plaintiffs' request to extend the Rule 33 limit to include ROGs 19-48.

Plaintiffs propose the following schedule:

- By 5 p.m. COB PT today (11/5): Plaintiffs to provide their portions of the three letter briefs to Meta.
- By 3 p.m. PT tomorrow (11/6): Meta to insert and send its portions of the three briefs to Plaintiffs (and identify any portions it will seek to seal).
- By 7 p.m. PT tomorrow (11/6): Plaintiffs to send any further edits based on Meta's responses.
- By 8 p.m. PT tomorrow (11/6): Meta to provide any further/final revisions or approval to file.
- By 9 p.m. PT tomorrow (11/6): Plaintiffs to file the three letter briefs and Meta to file any accompanying motion to seal.

Separately, Plaintiffs intend to file a discovery letter brief re: Meta's amended privilege logs and privilege claims on Friday, Nov. 8. Please let us know if you will agree to stipulate to suspend the page limits for this brief. We will also propose a schedule for exchanging portions. Thank you.

Best,

Max

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